# **Supplier Code of Conduct**

#### **Warburtons Values**

Warburtons is a leading grocery brand in Britain, selling wrapped bread, crumpets, fruit loaf, muffins, teacakes, wraps and a variety of Free From bakery products. We have a number of bakeries and depots all operating within Britain, providing our customers with a daily supply of fresh, top quality products.

Warburtons is a family business and expects everyone who works with us to share our family values and embrace responsible ethical practices. We build our business on the basis of five core values which shape everything we do, both inside and outside the company. These are:

- Family
- Ambition
- Responsibility
- Quality
- Care

## **Supplier Code of Conduct**

The Warburtons Supplier Code of Conduct sets out our expectations of all our suppliers.

This document is based on appropriate legal standards that uphold fair labour practices. These include:

- The Ethical Trading Initiative Base Code
- The Core Conventions of the International Labour Organisation
- The Universal Declaration of Human Rights

We recognise that the market in which we operate is constantly changing so we must continue to be flexible and will review our Code of Conduct as and when required to ensure that its contents and implementation remain appropriate and effective.

## **Expectations for Suppliers**

Warburtons is a family business and expects everyone who works with us to share our family values and embrace responsible employment practices.

As such, we expect our suppliers to comply, as a minimum, with all applicable laws in their country/countries of operation and with all applicable industry standards.

We also expect them to have written policies and procedures to make them compliant with the following standards and requirements:

# 1. Human rights

# Freely chosen employment

Workers must be free to choose their own employment. There must be no slavery, servitude, forced labour or human trafficking.

Workers must not be required to lodge identity papers or 'deposits' with their employers or labour providers, or take out loans as part of their employment agreements, and must be free to leave without penalty after giving reasonable notice.

#### No Child Labour

There must be no new recruitment of workers under the age of 15, except where national law imposes a lower minimum age of 14.

Where workers younger than this are found to be working, employers must develop or support programmes to help children attend and remain in quality education.

Young workers under 18 must not be employed at night or in hazardous conditions and all policies and procedures relating to the employment of young workers must conform to International Labour Organization standards.

To ensure that these principles are applied appropriately, all workers must provide valid identification documents to verify their age.

## 2.Worker rights

#### Freedom of Association and The Right to Collective Bargaining

Workers should be free to form or join trade unions and have the right to bargain collectively.

Employers should take an open approach to trade unions and their activities, and workers' representatives must be allowed to carry out their roles without discrimination.

Where the law restricts freedom of association and the right to collective bargaining, employers should support the creation of other forms of meaningful worker representation and negotiation on working conditions.

## Living Wages

As a minimum, wages paid for a normal working week should meet national legal standards.

Workers should be given understandable written information about wages and working conditions before they start their employment, along with details of how their wages are calculated and paid.

Deductions from wages, not provided for by law, cannot be made without the express permission of the worker concerned.

Excessive fines or penalties must not be imposed and all disciplinary measures should be recorded.



## Reasonable Working Hours

Working hours should comply with national laws.

Workers should not be required to work more than 48 hours a week on a regular basis and must be given, on average, at least one day off in every seven.

Overtime (time worked in addition to the worker's normal working hours) should be voluntary and should be compliant with national laws.

Managers should honestly record hours worked for both hourly and piece-rate workers.

## Regular Employment

Wherever possible, all work should be on the basis of recognised employment relationships established through national law.

Obligations to workers under laws and regulations should not be avoided through the use of labour-only contracts, sub- contracting, home-working arrangements, apprenticeships where there is no intention to provide skills training or regular employment, or through excessive use of fixed-term contracts.

#### Agency Workers' Rights

Agency workers shall be treated in line with national laws and must be treated with fairness and respect at all times.

Where necessary, the agencies used to supply workers must be certified by the relevant national, regional or industry body.

All agencies must be engaged under terms which outline the basic agreement, responsibilities and obligations on both sides.

## 3. Health and Safety

# Safe and Hygienic Working Conditions

A safe and hygienic working environment must be provided and, so far as possible, adequate steps taken to prevent accidents and injury to health.

Workers must be given regular and recorded health and safety training, and this should also be provided for new personnel and workers who are changing jobs.

There must be access to clean toilet facilities, potable water and, where appropriate, sanitary storage for food. Accommodation, where provided, must be clean, safe and meet workers' basic needs. It must be housed separately from production facilities.

Employers must give responsibility for health and safety to a senior management representative and support a 'safety first' culture.

Particular attention must be paid to fire alarms and the safety of buildings, chemicals and machinery, and workers must not be put at risk through excessive hours and inadequate rest periods.

#### 4.No Abuse

#### No Discrimination

There must be no discrimination in recruitment, pay, training, promotion, termination of employment or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation.

#### No Harsh or Inhumane Treatment

Physical discipline or abuse, the threat of physical abuse, verbal abuse, sexual or other forms of harassment or intimidation is never to be permitted.

#### 5.Environment

#### Minimising environmental impacts

Warburtons is committed to minimising its impact on the environment.

We expect our suppliers to share the same commitment and to comply with all applicable environmental laws and regulations in the country of operation.

Suppliers should continually seek to minimise their environmental impacts in areas such as greenhouse gas emissions, energy efficiency, and efficient and non-wasteful usage of resources.

# **6.Legal and Ethical Business Practice**

Suppliers shall conduct their businesses in accordance with all applicable legal requirements in the countries in which they operate. Suppliers shall:

- Comply with the UK Bribery Act and/or any other applicable local anti-bribery or corruption legislation
- Not engage in anti-competitive practices in violation of local competition or antitrust laws
- · Respect the intellectual property rights of others
- Protect the confidential or propriety information for all Warburtons group companies
- Suppliers shall have written policies prohibiting these behaviours

## 7. Supply Chain Compliance and Transparency

Our suppliers must recognise the role they play in promoting legally compliant and ethical sourcing practices with their own suppliers.

Suppliers shall ensure the principles of this code are passed onto and adhered to by all suppliers within their supply chain in line with Warburtons values and expectations.

Suppliers shall provide any information reasonably requested to demonstrate compliance with this code and their ethical approach to sustainable supply chain practices.

## 8. Changes to Supplier Code of Conduct

Warburtons reserves the right to change this Code of Conduct at any time. **Version: April 2018** 

